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Attorney for Defendant

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

v.

Jeremiah James JOHNSON,
Defendant.

Case No. 3:11-CR-374-MO

DECLARATION OF BENJAMIN
ANDERSEN IN SUPPORT OF SECOND
UNOPPOSED MOTION TO CONTINUE
TRIAL

I, Benjamin Andersen, under penalty of perjury, do declare:

1. I am the attorney for the above named defendant.
2. Trial in this case is presently set for October 30, 2012. Trial has been continued once before.
3. Investigation and preparation of this case is ongoing and will not be concluded before the presently set trial date.
4. Investigation has involved the acquisition of documents from Umatilla County and from the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) Court and Police Department. This document acquisition is still in progress.
5. Investigation has also involved a trip to the CTUIR.
6. Finding some of the witnesses in this case has proven difficult; some potentially important witnesses have not yet been located or interviewed.

7. AUSA John Haub and I have been in negotiations, and there is a high potential that we will resolve this case short of trial.
8. I have discussed with Mr. Johnson his speedy trial rights; he understands the reasons for and consents to this request for continuance. It is my belief that the ends of justice served by continuing trial in this matter outweigh the best interests of the public and Mr. Johnson in a speedy trial.
9. AUSA Haub does not oppose this motion.

DATED this 17th day of October, 2012.

Pacific Northwest Law, LLP

/s/
Benjamin T. Andersen, OSB 06256